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agricultural colleges. This act provides that the fund shall actually be paid to the State Treasurer and by him paid to the institution entitled to receive the same. The court held this to be a grant to the State, and that this being, therefore, a suit brought by a citizen against a State, the United States Court had no jurisdiction.

Libel—Mistake in Name.—*Hanson v. Globe Newspaper Co.*, 34 N. E. Rep. 462 (Mass.). A newspaper account of police court proceedings described a prisoner as H. P. H., a real estate and insurance broker of —; while in fact the prisoner was A. P. H. H., also a real estate and insurance broker of —. Suit by H. P. H. for libel. Held, three justices dissenting that it is necessary to allege and prove, in suits for libel, that the words were written "of and concerning the plaintiff," and in this case there was no intention to refer to him, the words did not concern him, and he could not recover.

Local Improvements—Assessments—Front Foot Rule.—*Haviland et al. v. City of Columbus et al.*, 34 N. E. Rep. 679 (Ohio). The plaintiffs in this suit owned a lot fronting on a street and extending lengthwise on an avenue which was improved as directed by a city ordinance. The city council assessed the cost by the front foot of all the property on the avenue. Held, that although a lot may be so used as to front lengthwise, yet where it lies lengthwise on a street, its real frontage must be taken as the basis of an assessment for improvements made on the street.

Married Women—Separate Earnings.—*In re Lewis' Estate*, 27 Atl. Rep. 35 (Penn.). A married woman, in whose family a man boarded under a contract with her husband, nursed and cared for him for a period of three years without any express contract. After his death she claimed compensation from his estate. The Pennsylvania statute provides that a married woman's earnings shall belong to her and not to her husband. Held, by a divided court, that her services were not included in the contract with her husband; that she could sue therefore in her own name without joining her husband, and recover a reasonable compensation.

Patents for Inventions—Expiration of Patent.—*Bragg Manuf'g Co. v. City of Hartford*, 56 Fed. Rep. 292. In this case the complainant endeavored to bring suit for the infringement of his patent four days before the expiration thereof, and the rule laid down in